

1 **SAO**

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5 *Attorney for Defendants*

7 **UNITED STATES DISTRICT COURT**

8 **STATE OF NEVADA**

9 THOMAS W. FINN, an individual,

10 Plaintiff,

11 vs.

12 CITY OF BOULDER CITY, a political
13 subdivision of the STATE OF NEVADA;
14 DAVE OLSEN, individually and in his
15 capacity as City Attorney of Boulder City;
16 ROGER ROBLER, individually and in his
17 capacity as Mayor of Boulder City; CAM
WALKER, ROD WOODBURY, PEGGY
LEAVITT, and DUNCAN MCCOY,
individually and in their capacities as City
Councilmembers,

18 Defendants.

CASE NO: 2:14-cv-01835-JAD-GWF

**STIPULATION AND ORDER TO
EXTEND TIME TO FILE A
RESPONSIVE PLEADING TO
PLAINTIFF'S FIRST AMENDED
COMPLAINT**

(First Request)

Date Requested: July 20, 2015

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20 COMES NOW, Plaintiff THOMAS W. FINN, by and through his attorney of record,
21 Sean P. Flanagan, Esq., of Flanagan Ltd., and Defendants CITY OF BOULDER CITY, a
22 political subdivision of the STATE OF NEVADA; DAVE OLSEN, individually and in his
23 capacity as City Attorney of Boulder City; ROGER ROBLER, individually and in his capacity as
24 Mayor of Boulder City; CAM WALKER, ROD WOODBURY, PEGGY LEAVITT, and
25 DUNCAN MCCOY, individually and in their capacities as City Councilmembers, by and
26 through their attorney of record, JEFFREY I. PITEGOFF, ESQ. of Morris, Sullivan, Lemkul &
27 Pitegoff, LLP., hereby stipulate and agree that Defendants be allowed up to and including **July**
28 **20, 2015** to file their responsive pleadings to Plaintiff's First Amended Complaint in the above-

captioned matter. The parties are requesting this extension of time because they are currently in negotiation to dismiss certain claims in this case, such as the Age Discrimination Act. Furthermore, Defendant's counsel is currently involved in a series of depositions due to conflicting vacation schedules.

DATED this 10th day of July, 2015

MORRIS, SULLIVAN, LEMKUL
& PITEGOFF, LLP

FLANAGAN, LTD

/s/ Jeffrey I. Pitegoff

Jeffrey I. Pitegoff, Esq.
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/s/ Sean Flanagan

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Attorney for Plaintiff

IT IS HEREBY ORDERED that Defendants are allowed up to and including July 20, 2015 to file their responsive pleadings to Plaintiff's Complaint in the above-captioned matter.

DATED this 13th day of July, 2015


UNITED STATES DISTRICT COURT JUDGE

DATED this 10th day of July 2015.

MORRIS, SULLIVAN, LEMKUL &
PITEGOFF, LLP

/s/ Jeffrey Pitegoff

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